

JAMES P. KEMP, ESQUIRE  
Nevada Bar No. 006375  
KEMP & KEMP, ATTORNEYS AT LAW  
7435 W. Azure Drive, Suite 110,  
Las Vegas, NV 89130  
(702) 258-1183 tel./ (702) 258-6983 fax  
[jp@kemp-attorneys.com](mailto:jp@kemp-attorneys.com)  
Attorney for Plaintiff TRUDE JOHNSON

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

TRUDE JOHNSON,

Plaintiff

vs.

PAM SPECIALTY HOSPITAL OF LAS  
VEGAS LLC, a Pennsylvania Limited Liability  
Company; Does I-X; Roe Corporations I-X,

Defendants

CASE NO. 2:24-cv-00086-CDS-EJY

**STIPULATION AND ORDER TO  
EXTEND TIME FOR PLAINTIFF TO  
RESPOND TO DEFENDANT'S MOTION  
TO DISMISS**

**(First Request)**

The parties, by and through their respective counsel, hereby stipulate to extend the time for Plaintiff to respond to the Defendant's Motion to Dismiss (ECF No. 7) from the current due date of Wednesday January 31, 2024 through and including Wednesday, February 7, 2024.

This is the first request for an extension of this deadline. The parties provide the following information to the Court regarding the proposed extension of time:

1. Plaintiff's counsel is presently out of the country on vacation through February 5, 2024.
2. Plaintiff's counsel has limited access to documents and the file and will not be able to discuss certain aspects of the Motion with the Plaintiff until he returns home. Accordingly, the response to the Motion cannot be

**KEMP & KEMP**  
ATTORNEYS AT LAW  
7435 W. Azure Drive, Suite 110  
LAS VEGAS, NEVADA 89130  
Tel. (702) 258-1183 • Fax (702) 258-6983

completed and finalized until after February 5, 2024.

This stipulation to extend the deadline is made in good faith and not for purposes of delay.

DATED January 31, 2024.

KEMP & KEMP, ATTORNEYS AT LAW

LITTLER MENDELSON, P.C.

By: /s/ James P. Kemp

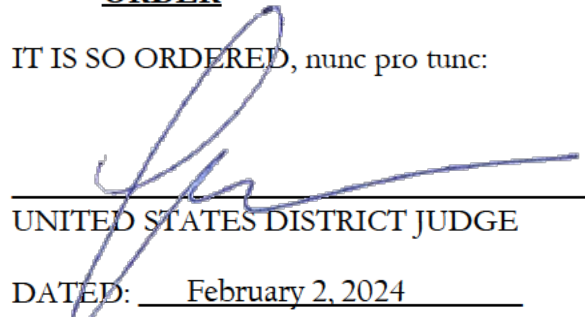
By: /s/ Andrew S. Clark

JAMES P. KEMP, ESQ.  
Nevada Bar No. 6375  
7435 W. Azure Drive, Suite 110  
Las Vegas, Nevada 89130  
*Attorneys for Plaintiff*

AMY L. THOMPSON, ESQ  
ANDREW S. CLARK, ESQ  
3960 Howard Hughes Pkwy., Suite 300  
Las Vegas, NV 89169  
*Attorneys for Defendant*

**ORDER**

IT IS SO ORDERED, nunc pro tunc:

  
UNITED STATES DISTRICT JUDGE

DATED: February 2, 2024

**KEMP & KEMP**  
ATTORNEYS AT LAW  
7435 W. Azure Drive, Suite 110  
LAS VEGAS, NEVADA 89130  
Tel. (702) 258-1183 • Fax (702) 258-6983